

To: Maria Armijo, Esq.
Randy M. Castellano
Assistant United States Attorney
District of New Mexico
Las Cruces Branch Office
555 S. Telshor Blvd., Suite 300
Las Cruces, NM 88011

From: Counsel for Billy Garcia, Joe Gallegos, Edward Troup, Rudy Perez

Re: Discovery in 15-cr-4268

Date: August 18, 2016

Dear Ms. Armijo,

I am writing on behalf of defendant Billy Garcia in case 15-cr-4268 and I am authorized to indicate that counsel for Joe Gallegos, Edward Troup, Rudy Perez join in the request detailed below.

We are in the process of working on a proposed scheduling order. Before we can make informed decisions on such proposals we need to know the status of discovery production. Discovery has been continuing to be produced in numerous batches with the most recent batch having been provided just a few days ago.

Can you provide the defense in 15-cr-4268 with a date when you believe the production of all non-Giglio, non-Jencks material will be concluded? Obviously, there will always be some new material that will be disclosed once it is produced but when will the government be finished disclosing material it currently knows it must disclose? Included in this request is a date by which all Crim. P. 16 material will be produced as outlined in a letter I sent on June 23, 2016.

Your prompt attention to this matter is appreciated.

Sincerely,

Jim Castle
Attorney for Billy Garcia